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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA)	CR 14-527-4 RS
)	
v.)	
)	STIPULATION AND PROPOSED ORDER FOR
ROBERT CHUN,)	A CONTINUANCE AND EXCLUSION OF TIME
)	UNDER THE SPEEDY TRIAL ACT, 18 U.S.C.
Defendant.)	§ 3161 ET. SEQ

The United States of America, by and through its attorney of record, and the above-captioned defendant ("defendant"), by and through his respective attorney of record, hereby stipulate as follows:

1. For the reasons stated in open court on May 24, 2016, the Court continued the above-captioned matter to August 2, 2016 at 2:30 p.m. and excluded time under the Speedy Trial Act from May 24, 2016 through August 2, 2016 based upon effective preparation of counsel under 18 U.S.C. §§3161(h)(7)(A) and (B)(iv).

2. The parties stipulate and agree that this matter should be continued to August 2, 2016 at 2:30 p.m., and that the failure to grant such a continuance would unreasonably deny the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The parties further stipulate and agree that the time from May 24, 2016 through August 2, 2016 should

be excluded based upon the complexity of the case in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(B)(ii), and on the basis that the ends of justice are served by taking such action which outweigh the best interest of the public and the defendant in a speedy trial and for effective preparation of counsel, taking into account the exercise of due diligence, under 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

DATED: May 25, 2016

Respectfully submitted,

BRIAN J. STRETCH
United States Attorney

/s/
DEBORAH R. DOUGLAS
Assistant United States Attorney

/s/
RANDALL KNOX, Esq.
Attorney for Defendant Robert Chun

ORDER

Upon the parties' stipulation, and GOOD CAUSE appearing, IT IS HEREBY ORDERED that the above-captioned matter shall be continued to August 2, 2016 at 2:30 p.m. and that the time from May 24, 2016 through August 2, 2016 shall be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(B)(ii), and 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv). The Court finds that (A) the above-captioned matter is complex based upon the nature of the prosecution; (B) failure to grant the continuance would unreasonably deny the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence; and (C) the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial.

IT IS SO ORDERED.

DATED: May 25, 2016


HONORABLE RICHARD SLEBORG
UNITED STATES DISTRICT JUDGE